

Ryan P. Steen (Bar No. 0912084)

ryan.steen@stoel.com

Jason T. Morgan (Bar No. 1602010)

jason.morgan@stoel.com

Whitney A. Brown (Bar No. 1906363)

whitney.brown@stoel.com

STOEL RIVES LLP

600 University Street, Suite 3600

Seattle, WA 98101

Telephone: 206.624.0900

Facsimile: 206.386.7500

Attorneys for Alaska Oil and Gas Association and American Petroleum Institute

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

GWICH'IN STEERING COMMITTEE,
et al.,

Plaintiffs,

v.

DAVID L. BERNHARDT, in his official
capacity as Secretary of the Interior, et al.,

Defendants,

and

NORTH SLOPE BOROUGH, et al.,

Intervenor-Defendants,

and

ALASKA OIL AND GAS ASSOCIATION
et al.,

Intervenor-Defendants.

No.: 3:20-cv-00204-SLG

**RESPONSE TO JOINT MOTION AND STIPULATION TO EXPEDITE
CONSIDERATION OF PLAINTIFFS' MOTION FOR TEMPORARY
RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

Gwich'in Steering Committee, et al. v. Bernhardt, et al.

Case No. 3:20-cv-00204-SLG

1

Intervenor-Defendants Alaska Oil and Gas Association and American Petroleum Institute (the “Associations”) respectfully provide this brief response to the Joint Motion and Stipulation to Expedite Consideration of Plaintiffs’ Motion for Temporary Restraining Order and Preliminary Injunction (“Joint Motion”). *See* ECF No. 48.

Plaintiffs have filed a motion for a preliminary injunction to prohibit the Bureau of Land Management (“BLM”) from issuing leases pursuant to the Coastal Plain Oil and Gas Leasing Program, and seek approval for a schedule that will resolve their motion by January 6, 2020. BLM produced its Record of Decision in August 2020, Plaintiffs filed their complaint on August 24, 2020, and BLM issued a Call for Nominations for the lease sale in November 2020. Yet Plaintiffs only now spring a preliminary injunction motion on the defendants and the Court right before (and during) many holidays, based on their desire for interim relief by January 6, 2021. Moreover, no on-the-ground activities will be happening under the challenged Coastal Plain Oil and Gas Leasing Program on January 6, 2020, and, in fact, it may be years before any on-the-ground activities commence (if ever). Accordingly, Plaintiffs’ urgency is artificial. With those things said, the Associations will comply with the briefing schedule that has been proposed in the Joint Motion.

DATED: December 16, 2020.

STOEL RIVES LLP

By: s/ Ryan P. Steen

RYAN P. STEEN (Bar No. 0912084)

JASON T. MORGAN (Bar No. 1602010)

WHITNEY A. BROWN (Bar No. 1906363)

Attorneys for Alaska Oil and Gas
Association and American Petroleum
Institute

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Case No. 3:20-cv-00204-SLG

3

CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2020, I filed a true and correct copy of the foregoing document with the Clerk of the Court for the United States District Court of Alaska by using the CM/ECF system. Participants in this Case No. 3:20-cv-00204-SLG who are registered CM/ECF users will be served by the CM/ECF system.

Brook Brisson	bbrisson@trustees.org
Suzanne Bostrom	sbostrom@trustees.org
Bridget Psarianos	bpsarianos@trustees.org
Brian Litmans	blitmans@trustees.org
Karimah Schoenhut	karimah.schoenhut@sierraclub.org
Mark Arthur Brown	mark.brown@usdoj.gov
Paul A. Turcke	paul.turcke@usdoj.gov
Tyson C. Kade	tck@vnf.com
Jonathan David Simon	jxs@vnf.com
Melinda Louise Meade Meyers	mmeademeyers@vnf.com
Jeanie A. Nelson	anne.nelson@alaska.gov
Ronald W. Opsahl	ron.opsahl@alaska.gov

/s/ Ryan P. Steen

Ryan P. Steen

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